Case 4:18-cr-20812-MFL-SDD ECF No. 81, PageID.494 Filed 08/16/21 Page 1 of 6

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 4:18-cr-20812-MFL-SDD

-vs-

Judge: HON. MATTHEW F. LEITMAN

D-3 CAROL ALMERANTI,

Defendant.

DEFENDANT'S AMENDED EX-PARTE PETITION TO PERMIT SPECIFIC TRAVEL

NOW COMES Defendant CAROL ALMERANTI by and through her attorneys HELMKAMP, ELLIS, ABRAHAM & ENGERER, and for her Amended Ex-Parte Petition to Permit Specific Travel states:

- 1. On May 22, 2019 Defendant CAROL ALMERANTI entered a plea.
- 2. Ms. Almeranti desires to briefly travel outside of the country to Mexico from January 12 to January 19, 2022 for a family vacation with her sisters.
- 3. Sentencing is currently scheduled for after her return and is likely to be postponed again.
- 4. Defendant has been fully cooperative at every stage of proceedings and continues to assist the Department of Justice in its ongoing investigation.
- 5. Defendant's Pre-trial Officer does not object to the requested travel (EXHIBIT 1).
- 6. The Government defers to Pre-Trial Services and the Court (EXHIBIT 2).

WHEREFORE, Defendant respectfully requests that this Honorable Court direct Pre-trial services to relinquish Defendant's passport

HELMKAMP, ELLIS, ABRAHAM & ENGERER

AN ASSOCIATION OF ATTORNEYS

AND COUNSELORS AT LAW

NOT A PARTNERSHIP

19500 VICTOR PARKWAY

SUITE 150

LIVONIA, MICHIGAN 48152

(734) 591-3737

Case 4:18-cr-20812-MFL-SDD ECF No. 81, PageID.495 Filed 08/16/21 Page 2 of 6 and permit her limited travel from January 12 to January 19, 2022.

Defendant will again relinquish the passport after her return and continue to comply with all other terms as directed.

HELMKAMP, ELLIS, ABRAHAM & ENGERER

/s/ Douglas C. Abraham P-34654 Attorney for Defendant 19500 Victor Parkway, Suite 150 Livonia, Michigan 48152 P (734) 591-3737 E headesg@aol.com

DATED: August 16, 2021

AFFIDAVIT

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

DOUGLAS C. ABRAHAM, being first duly sworn, deposes and says:

- 1. He is the attorney for Defendant in the above entitled cause;
- 2. He has read the foregoing Defendant's Amended Ex-Parte Petition to Permit Specific Travel and knows the contents thereof, and that the same is true of his own knowledge except as to those matters therein stated to be on information and belief and as to those matters, he believes them to be true.

FURTHER, Affiant says not.

/s/ Douglas C. Abraham

Subscribed and sworn to before me this 16^{th} day of August, 2021.

/s/ Kelly S. Barker, Notary Public
Oakland County acting in Wayne County, Michigan
My Commission Expires: 2/10/25

HELMKAMP, ELLIS, ABRAHAM & ENGERER

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(734) 591-3737

EXHIBIT 1

Case 4:18-cr-20812-MFL-SDD ECF No. 81, PageID.497 Filed 08/16/21 Page 4 of 6

From: Brian_Harmon@miept.uscourts.gov,

To: headesq@aol.com,

Subject: RE: Carol Almeranti Petition to Permit Specific Travel

Date: Mon, Aug 16, 2021 1:35 pm

Attachments:

Okay. I am fine with the travel.

Brian Harmon

United States Pretrial Services Officer

Eastern District of Michigan

231 West Lafayette

Detroit, MI 48226



313-234-5319 (Phone)

313-202-5924 (Fax)

brian harmon@miept.uscourts.gov

From: headesq@aol.com <headesq@aol.com> Sent: Monday, August 16, 2021 1:34 PM

To: Brian Harmon < Brian Harmon@miept.uscourts.gov> Subject: Re: Carol Almeranti Petition to Permit Specific Travel

CAUTION - EXTERNAL:

Mexico only.

EXHIBIT 2

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From: Mark.S.McDonald@usdoj.gov,

To: headesq@aol.com,

Subject: Re: Rosett, Miller, Almeranti (4:18-CR-20812)

Date: Thu, Jul 29, 2021 12:08 pm

Hello. Please run it by pretrial services. We will defer to them

Mark (Mac) McDonald

Trial Attorney
U.S. Department of Justice, Tax Division
Northern Criminal Enforcement Section
150 M Street N.E. - Room 1.1405
Washington, D.C. 20002
(202) 305-2672 [Office]
(703) 328-5779 [Cell]

From: headesq@aol.com < headesq@aol.com >

Date: July 29, 2021 at 12:03:40 EDT

To: McDonald, Mark S. (TAX) < Mark.S. McDonald@tax.USDOJ.gov>

Subject: Re: Rosett, Miller, Almeranti (4:18-CR-20812)

Hi Mac,

Ms. Almeranti requests permission to travel with her sisters January 12-19, 2022.

Can we stipulate to the attached order?

Doug

Douglas C. Abraham, Esq. 19500 Victor Parkway, Suite 150

Livonia, MI 48152

P: (734) 591-3737

F: (734) 591-6275

E: headesq@aol.com

----Original Message----

From: McDonald, Mark S. (TAX) < Mark.S.McDonald@usdoj.gov>

To: headesq@aol.com <headesq@aol.com>; Maurice Davis <maurice@michigancriminallawyer.com>; ben@goneklaw.com

Gonek <ben@goneklaw.com>
Sent: Fri, Apr 30, 2021 6:29 pm

Subject: Rosett, Miller, Almeranti (4:18-CR-20812); stipulation to continue sentencing to Jan 2022

Defense counsel -